

As a Certificated Airman holding the ratings of Mechanic: Airframe and Powerplant and a well experienced experimental kitplane and ultralight builder and an Aerospace engineer in training. I would like to make the following comments:

1. The gross weight limitation for the proposed aircraft falling within the proposed rulemaking should be increased to no less than 1300 lb. The current 1225 lb limitation is abstract and carries no real importance other than being the actual weight of some aircraft that the FAA considers as a candidate for the ruling. The additional weight limit would allow for stronger airframes for larger people like myself. The lower standard may in fact be discriminative of heavier people.
2. The training requirements for qualification to maintain the proposed aircraft is much to low. No less than a certified mechanic should be allowed to work at will on the various aircraft. This does not include repairmen certificates issued for an individual to perform maintenance on his personal aircraft that he built. However to allow a person with less training and knowledge required to obtain an A&P certificate to perform maintenance on different types of aircraft is dangerous to the public at large. Additionally since the proposed aircraft will be simple a certificated mechanic that DOES NOT hold an IA rating SHOULD be allowed to perform annual airworthiness and condition inspections and SHOULD be allowed to return these aircraft to service after said inspections and major repairs and/or modifications.
3. There exist in the ultralight community a few aircraft designs, with many aircraft in field, utilizing two engines. Under the proposed rule making the trainers used to train in these type aircraft would have to come under the proposed ruling and therefore become in fact licensed aircraft as there is no provision for twin engined aircraft. This would place an overly harsh and unbearable burden upon those owning and operating said aircraft. The owner/operator would be forced into obtaining a multiengine pilot rating and a multiengine cfi rating to train in said aircraft. Currently the FAA allows these types of aircraft to obtain a waiver through several organizations. I propose that the FAA include twin engine aircraft that fall outside of 14CFR Part 103 regulations by a special classification that preserves the ultralight status of said aircraft for training purposes only, or to include said aircraft into the NPRM as twin engine sport aircraft so long as all other proposed performance and dimensional criteria fall within the proposed limitations.